

Brian T. Kiolbasa, OSB No. 112890
kiolbasab@lanepowell.com
LANE POWELL PC
601 S.W. Second Avenue, Suite 2100
Portland, Oregon 97204
Telephone: 503.778.2100
Facsimile: 503.778.2200

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

SCI COLLABORATION, LLC, a Florida
limited liability company, NIKKI BUZZETTA
and KEN LUNA,

Plaintiffs,

v.

SPORTS CAR INTERNATIONAL, LLC, an
Oregon limited liability company, and JOHN
MICHIAL SHUMATE,

Defendant.

Case No. 3:20-cv-00170-AC

**MOTION TO WITHDRAW AS
COUNSEL FOR PLAINTIFFS**

(Expedited Consideration Requested)

I. LR 7-1 CERTIFICATE OF CONFERRAL

Counsel for plaintiffs certifies that he has conferred with counsel for defendants, and that defendants do not oppose this Motion.

II. MOTION

Pursuant to LR 83-11, Brian T. Kiolbasa and Lane Powell PC, as counsel for plaintiffs SCI Collaboration, LLC, Nikki Buzzetta, and Ken Luna (collectively, “plaintiffs”) respectfully moves the Court for leave to withdraw as counsel for plaintiffs in this matter. In support of this Motion, counsel submits the Declaration of Brian T. Kiolbasa (“Kiolbasa Decl.”).

Good cause exists for counsel's withdrawal from representation of plaintiffs in this matter. (Kiolbasa Decl. ¶¶ 3-4.)

There is no trial date currently set in this matter, and withdrawal will not cause unnecessary delay or disruption of this lawsuit. (Kiolbasa Decl. ¶¶ 5-6.)

Plaintiffs are aware of this Motion, and likewise have been counseled regarding the possibility of withdrawal. (Kiolbasa Decl. ¶ 7.)

If this Motion is granted, the Court and parties can direct all future service and communications in this matter as follows:

Ms. Nikki Buzzetta
SCI Collaboration, LLC
7827 Blue Sage Way
Parkland, Florida 33076
buzznikki25@gmail.com

Mr. Ken Luna
SCI Collaboration, LLC
4410 Westheimer Rd., Apt. 2301
Houston, Texas 77027
ken.safslc@gmail.com

III. CONCLUSION

For the foregoing reasons, the undersigned counsel respectfully requests that the Court enter an Order granting them leave to withdraw as counsel for plaintiffs.

DATED: January 6, 2021

LANE POWELL PC

By: s/ Brian T. Kiolbasa
Brian T. Kiolbasa, OSB No. 112890
Telephone: 503.778.2100
Attorneys for Plaintiffs